

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE CHICAGO PAINTERS	)	
AND DECORATORS PENSION FUND,	)	
TRUSTEES OF THE CHICAGO PAINTERS	)	
AND DECORATORS WELFARE FUND,	)	
TRUSTEES OF THE CHICAGO PAINTERS	)	
AND DECORATORS DEFERRED SAVINGS	)	
FUND, TRUSTEES OF THE CHICAGO	)	
PAINTERS AND DECORATORS	)	
APPRENTICESHIP FUND, TRUSTEES OF	)	
THE CHICAGO PAINTERS AND	)	
DECORATORS SCHOLARSHIP FUND,	)	No. 23-cv-6804
AND TRUSTEES OF THE CHICAGO	)	
PAINTERS AND DECORATORS JOINT	)	
COOPERATION TRUST FUND,	)	
	)	
Plaintiffs,	)	JUDGE GOTSCHALL
	)	
v.	)	
	)	
BLUE DOOR PAINTING AND	)	
DECORATING, INC.,	)	
an Illinois corporation,	)	
	)	
Defendant.	)	

**INITIAL STATUS REPORT**

The Parties, Plaintiffs, Trustees of the Chicago Painters and Decorators Pension Fund, et al. by and through their attorneys, Grant R. Piechocinski and ARNOLD AND KADJAN, LLP and Defendant, Blue Door Painting and Decorating, Inc., by and through its attorney Vaughn White, VW LAW, LLC, hereby submit this Initial Status Report. In support thereof, Plaintiffs state as follows:

**1. Identify the attorneys of record for each party and identify the lead attorney for each party.**

Plaintiffs:

PAUL M. EGAN (Lead Attorney)  
GRANT R. PIECHOCINSKI  
Arnold and Kadjan, LLP  
35 East Wacker, Suite 600  
Chicago, Illinois 60601  
(312) 236-0415

Defendant:

Vaughn White  
VW LAW, LLC  
1755 Park St., Suite 200  
Naperville, IL 60563

**2. State the basis of this court's subject matter jurisdiction.**

Jurisdiction of this cause is Section 301 of the National Labor Relations Act, as amended, 29 U.S.C. 185(a), and Section 502 of the Employee Retirement Security Act (ERISA) of 1974, as amended, 29 U.S.C. Section 1132(e)(1), 1145 and 28 U.S.C. Section 1331, and federal common law.

**3. Briefly describe the nature and scope of the case, the principal legal issues, and the principal factual issues.**

Legal Issues

The principal legal issue is to what extent Defendant has breached its obligation to pay contributions and other amounts owed to Plaintiffs during the audit time period.

Factual Issues

The principal factual issue will be whether Defendant paid all contributions in accordance with the due dates stated in the applicable Agreements during the audit time period.

**4. Identify any party who has not yet been served in accordance with Federal Rule of Civil Procedure 4 and indicate when service is expected to be completed.**

Defendant has been served with the summons and complaint.

**5. State whether the parties consent to the reassignment of the case to the designated magistrate judge.**

The parties do not consent to the reassignment of the case to the designated magistrate judge at this time.

**6. State whether a jury trial has been demanded or is expected by any party.**

No jury trial has been demanded or is expected by any party.

**7. Describe any discovery that has occurred and any anticipated in the future.**

Discovery would be related to the audit findings and any challenges that defendant may have to the audit findings.

**8. Identify settlement opportunities.**

The fringe benefit audit is completed. The Defendant is currently reviewing the audit findings.

**9. Except in classes of cases exempted by Local Rule 16.1.1(b), propose a discovery schedule complying with Federal Rule of Civil Procedure 16(b)(3), including proposed deadlines for joining parties, amending pleadings, completing discovery, and filing dispositive and other motions.**

Defendant has not filed an answer, or otherwise plead in this matter. Therefore, setting a discovery schedule is premature.

**10. Propose a deadline for filing the next status report**

Plaintiffs suggest filing a status report in forty-five days.

Respectfully submitted,

TRUSTEES OF THE CHICAGO PAINTERS  
AND DECORATORS PENSION FUND, et al.,

Blue Door Painting and Decorating, Inc.

By: /s/Grant R. Piechocinski  
One of their Attorneys

By: /s/Vaughn White  
Its Attorney

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